

Page 1

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION

W.K., E.H., M.M., R.P., M.B.,  
D.P., A.F., C.A., R.K. and K.P.,

Plaintiffs,

vs.

**PL Sum. J.**  
**Ex. 006**

CIVIL ACTION NO.:  
1:20-CV-05263-MHC

RED ROOF INNS, INC.; FMW RRI  
NC, LLC; RED ROOF FRANCHISING,  
LLC; RRI WEST MANAGEMENT, LLC;  
VAHARI HOTEL, LLC; WESTMONT  
HOSPITALITY GROUP, INC.;  
and RRI III, LLC,  
Defendants.

VIDEOTAPED DEPOSITION OF JANE DOE 4

June 24, 2022

9:15 a.m.

1960 Satellite Boulevard, Suite 4000

Duluth, Georgia

Carolyn M. Carboni, RPR, RMR, CCR-B-878

Leo Mileman, Videographer

Page 2

## 1 APPEARANCES OF COUNSEL:

2 On behalf of the Plaintiffs in Jane Doe, et al. v.  
3 Westmont Hospitality Group, et al. case:

4 TIANA S. MYKKELTVEDT, ESQUIRE

5 MICHAEL R. BAUMRIND, ESQUIRE (via Zoom)

6 Bondurant Mixson & Elmore LLP

7 One Atlantic Center

8 Suite 3900

9 1201 West Peachtree Street

10 Atlanta, Georgia 30309

11 404.881.4144

12 On behalf of the Defendants Red Roof Inns, Inc.;  
13 FMW RRI NC, LLC; Red Roof Franchising, LLC; RRI  
14 West Management, LLC; Westmont Hospitality Group,  
15 Inc.; and RRI III, LLC:

16 EMMA J. FENNELLY, ESQUIRE

17 PEYTON PATTERSON, ESQUIRE

18 Lewis Brisbois Bisgaard & Smith LLP

19 600 Peachtree Street

20 Suite 4700

21 Atlanta, Georgia 30308

22 404.348.8585

1 APPEARANCES (Continued):

2 On behalf of the Defendant Varahi Hotel, LLC:

3 ELLIOTT REAM, ESQUIRE

4 Hawkins Parnell & Young, LLP

5 Suite 4000

6 303 Peachtree Street

7 Atlanta, Georgia 30308

8 404.614.7400

9 Also Present:

10 Haryson Blair

11 Beth Richardson (via videoconference)

12  
13 - - -  
14  
15  
16

17 (Pursuant to Article 10(B) of the Rules  
18 and Regulations of the Georgia Board of Court  
19 Reporting, a written disclosure statement was  
20 submitted by the court reporter to all counsel  
21 present at the proceeding.)  
22  
23  
24  
25

Page 2

## 1 APPEARANCES OF COUNSEL:

2 On behalf of the Plaintiffs in Jane Doe, et al. v.  
3 Westmont Hospitality Group, et al. case:

4 TIANA S. MYKKELTVEDT, ESQUIRE

5 MICHAEL R. BAUMRIND, ESQUIRE (via Zoom)

6 Bondurant Mixson & Elmore LLP

7 One Atlantic Center

8 Suite 3900

9 1201 West Peachtree Street

10 Atlanta, Georgia 30309

11 404.881.4144

12 On behalf of the Defendants Red Roof Inns, Inc.;  
13 FMW RRI NC, LLC; Red Roof Franchising, LLC; RRI  
14 West Management, LLC; Westmont Hospitality Group,  
15 Inc.; and RRI III, LLC:

16 EMMA J. FENNELLY, ESQUIRE

17 PEYTON PATTERSON, ESQUIRE

18 Lewis Brisbois Bisgaard & Smith LLP

19 600 Peachtree Street

20 Suite 4700

21 Atlanta, Georgia 30308

22 404.348.8585

1 APPEARANCES (Continued):

2 On behalf of the Defendant Varahi Hotel, LLC:

3 ELLIOTT REAM, ESQUIRE

4 Hawkins Parnell & Young, LLP

5 Suite 4000

6 303 Peachtree Street

7 Atlanta, Georgia 30308

8 404.614.7400

9 Also Present:

10 Haryson Blair

11 Beth Richardson (via videoconference)

12  
13 - - -  
14  
15  
16

17 (Pursuant to Article 10(B) of the Rules  
18 and Regulations of the Georgia Board of Court  
19 Reporting, a written disclosure statement was  
20 submitted by the court reporter to all counsel  
21 present at the proceeding.)  
22  
23  
24  
25

1 the day. But if you need a break for any reason,  
2 just let me know. You'll have to answer the last  
3 question that was posed, but then we can take a  
4 break whenever you need.

5 A Yes, ma'am.

6 Q Have you taken any medication or anything  
7 that would affect your ability to testify  
8 truthfully today?

9 A No, ma'am.

10 Q Okay. So just as a general background,  
11 you allege that the years you were trafficked were  
12 2010 to 2012, as well as a few days in 2013; is  
13 that correct?

14 A Yeah. It was either the end of 2010 into  
15 2011 or -- yeah, and then it pretty much capped at,  
16 like, 2012, like, after April, and for a moment in  
17 2013, yes.

18 Q Okay.

19 A But there was a gap in between 2012 and  
20 2013 --

21 Q And 2013?

22 A -- it happened. Yes, ma'am.

23 Q Okay. And the hotels that you allege this  
24 happened at as far as Red Roof are Smyrna and  
25 Buckhead; is that correct?

1 A Yeah, North Druid Hills and Smyrna.

2 Q North Druid Hills and Smyrna?

3 A Yes.

4 Q Okay. And your alleged traffickers, there  
5 were two; is that right?

6 A Traffickers?

7 Q I believe Diablo and CB were the  
8 traffickers alleged.

9 A Yes, ma'am.

10 Q And Diablo was from 2010 to 2012, that  
11 first period?

12 A Yes, ma'am.

13 Q And then CB was later on in 2013?

14 A Yes, ma'am.

15 Q Okay. And one thing I forgot to say, and  
16 I'm really bad at this, too, I talk really quickly  
17 normally. But because she's taking everything  
18 down, we have to go a little bit slower. And when  
19 I ask a question, just wait for me to finish it so  
20 she can get the question down, and then you can  
21 answer, and I'll wait for you to finish your  
22 answer. So just for her, we'll do that.

23 What did you do to prepare for this  
24 deposition today?

25 A Met with my lawyers.

Page 15

1 of your responses to these interrogatories, and  
2 maybe that will refresh your recollection a little  
3 bit.

4 So if you'll turn to -- it's going to say  
5 interrogatory number 4, which starts on page 6.  
6 Are you with me?

7 A Yes, ma'am.

8 Q So this asks for the name and contact  
9 information of people that have knowledge related  
10 to your claims. And if you'll turn to the next  
11 page -- excuse me, two pages over, it starts on  
12 page 8, I just want to go through briefly this  
13 chart of the people that you say have information  
14 related to these claims and ask you a few  
15 questions.

16 A Yes, ma'am.

17 Q The first name is Bagz, and I understand  
18 he is an alleged trafficker associated with Mr. --  
19 how do you -- is it [REDACTED]?

20 A [REDACTED], I believe.

21 Q Okay. And is that Diablo?

22 A Yes, ma'am.

23 Q Is that Diablo? Okay.

24 So he's an associate of Diablo and CB.

25 How did you meet Bagz?

1 A I met Bagz through Diablo.

2 Q And when was that?

3 A Roughly the end of 2010.

4 Q Where did you meet him?

5 A I met him at the condos in Winding River.

6 I don't know the specific number.

7 Q That's okay. When was the last time you  
8 spoke to Bagz?

9 A 2012.

10 Q The next name is Black. It says you don't  
11 know the real name. This was an associate of your  
12 alleged traffickers as well. How do you know  
13 Black?

14 A Black was the girl they used to book  
15 calls. I never formally met her, but I would,  
16 like, during my trafficking, I would receive a  
17 phone call from her, like what my name was, what  
18 the time was, and for how much it was to be for.

19 Q She would call you and give you that  
20 information?

21 A Those three things, and then hang up.

22 Q And when you say she would call and tell  
23 you what your name was, I assume you mean what your  
24 alias was for that --

25 A Yes, ma'am.

1 Q -- job? Okay.

2 A It wasn't a job either.

3 Q When was the last time you spoke to Black?

4 A Not since the last phone call she gave me,  
5 I would say, which was, I'm going to say, early  
6 2012.

7 Q How often would you get calls from her?

8 A Any time I was trafficked in a hotel.  
9 This one is Red Roof specifically. Every time I  
10 was at the Red Roof Inn or if there was a -- I  
11 mean, she was -- I didn't know I had anyone coming  
12 until she gave me that information.

13 Q Would she book calls at other hotels for  
14 you as well?

15 A She was -- she did all of them.

16 Q So she did everywhere at --

17 A Yes, ma'am.

18 Q -- other hotels as well?

19 A Yes, ma'am.

20 Q The next name is Bless or Blessed. This  
21 was another alleged trafficker associated with your  
22 alleged traffickers. How do you know Bless?

23 A Bless was just another trafficker that was  
24 in the, I guess, the group of all of them.

25 Q Was that group called Pimps in Very

1 Important Places or PIVIP? Are you familiar with  
2 that?

3 A Yes, ma'am.

4 Q Okay.

5 A But that wasn't instantly -- that's not  
6 what they were always known for.

7 Q Okay. Can you explain that? What do you  
8 mean?

9 A I guess PIVIP came along maybe, you know,  
10 like, four or five months after I guess -- I didn't  
11 meet them as that. I didn't know any of that. But  
12 when they got the building at -- off of Northridge  
13 Road or Drive, off exit 6 in Sandy Springs, that's  
14 when I started seeing the PIVIP stuff.

15 Q Okay. And you say the building. Was that  
16 a music studio?

17 A Yes, I believe that was it.

18 Q When was the last time you spoke to Bless?

19 A Oh, I don't know. It's been a really long  
20 time. I want to say I only met him, like, a couple  
21 of times because he was arrested, I believe, for  
22 underaged.

23 Q The next name is CB who was one of your  
24 traffickers, so we'll talk about him more later.

25 A Yes, ma'am.

1 Q The next name is Fresh. How do you know  
2 Fresh?

3 A Fresh was just another trafficker in the  
4 group of the other traffickers.

5 Q Kind of the same as Bless?

6 A Yes, ma'am.

7 Q Okay. When was the last time you spoke to  
8 Fresh?

9 A Probably the end of -- or the beginning of  
10 2012.

11 Q The next name is -- is it Kukk?

12 A Kukk.

13 Q Kukk. How do you -- is Kukk the same as  
14 Fresh and Bless?

15 A Yes, ma'am.

16 Q And when was the last time you spoke to  
17 Kukk?

18 A Same time.

19 Q Nitty, was Nitty the same as --

20 A Yes, ma'am.

21 Q -- the previous trafficker -- alleged  
22 traffickers we've named?

23 What about Panama?

24 A The same for Nitty and the others.

25 Q Okay. What about Kwan, was he the same as

1 Panama?

2 A Yes, ma'am.

3 Q And Tricky, was that the same situation?

4 A Yes, ma'am.

5 Q And these were all members of PIVIP?

6 A Yes, ma'am.

7 Q Or what became PIVIP?

8 A Yes, ma'am.

9 Q [REDACTED], was he in PIVIP?

10 A Yes, ma'am.

11 Q And then -- when was the last time you  
12 spoke to anyone from PIVIP?

13 A Probably -- it was probably -- anybody  
14 would be CB for those four days in 2013. But prior  
15 to that, I did not speak to anybody, I would say,  
16 like, April of 2012, Diablo was arrested, and then  
17 I guess I wasn't completely gone.

18 Q What do you mean when you say you weren't  
19 completely gone? Do you mean you were still  
20 somewhat associated with PIVIP after Diablo's  
21 arrest; is that what you mean?

22 A Yes, ma'am. Because the orders given by  
23 him were that I was to stay under their eye until  
24 what was determined with the outcome of his arrest.

25 So I would say the last time I've talked

Page 21

1 to anyone else would -- I'd probably say by roughly  
2 the middle of 2012 was -- I was -- I was done.

3 Q And who was watching you after -- you said  
4 kept an eye on you. Who was doing that after  
5 Diablo was arrested?

6 A It went from Bagz to Kwan to being at the  
7 studio at Northridge Drive to -- I guess just as  
8 long as one of their sets were on me -- one of  
9 their set of eyes were on me.

10 Q But you haven't alleged that Bagz or Kwan  
11 was a trafficker, correct, was one of your  
12 traffickers, correct?

13 A No, ma'am.

14 Q Okay. Why is that if they watched you  
15 after Diablo was arrested?

16 A I don't know their code. I just did what  
17 I was told.

18 Q What do you mean "their code"?

19 A I mean, like, I don't know why I -- why I  
20 was watched by them. I don't know.

21 Q But you don't allege that they trafficked  
22 you, correct?

23 A No, ma'am.

24 Q So after Diablo was arrested in two  
25 thousand and -- April of 2012, you were no longer

1 Q And so I'm just trying to figure out why  
2 you were still with Bagz and Kwan --

3 A That's why I was in the Red Roof Inn.

4 Q -- when Diablo -- if you'll let me ask my  
5 question, please.

6 I'm trying to figure out why you were  
7 still with Bagz and Kwan after Diablo was arrested  
8 driving them around and at the hotels.

9 A Because I was instructed -- I guess Diablo  
10 told Bagz what to do with me, and so that's what I  
11 did.

12 Q So Bagz was telling you what to do?

13 A Yes, I guess. You asked if he was telling  
14 me what to do or if he's trafficking me. So which  
15 answer do you want?

16 Q Was he telling -- we'll start -- we'll do  
17 both. Was he telling you what to do?

18 A Yes, ma'am.

19 Q And that wasn't trafficking you?

20 A No. That's not his money. I'm not his  
21 property.

22 Q Who was getting the money?

23 A He was in prison, so no one could make  
24 money off of me.

25 Q Were you engaging in sex for money after

1 that I was at anywhere else.

2 Q When you would go to these hotels, was the  
3 room in your name?

4 A No. I mean, sometimes, if he wanted me  
5 to, then I -- I mean, I had that ability to do so,  
6 but that was only if told or instructed. It  
7 wasn't -- normally, he went up to, like -- I mean,  
8 he would just tell them, like, I need a room for  
9 her. And he would pay cash or -- and, like, no  
10 questions were asked. No IDs or anything were  
11 asked for or anything like that. It was just like  
12 the fee for the room. And, like, no checkout after  
13 15 minutes.

14 Q Did you -- strike that.

15 Can you list all of the hotels, excluding  
16 the Red Roof Smyrna and Red Roof Buckhead, that you  
17 were trafficked at, any hotels at all?

18 A I'd say it's the Smyrna and North Druid  
19 Hills Red Roof Inn, the Microtel across from the  
20 Pink Pony, Suburban Extended Stay, the La Quinta,  
21 the Hampton Inn. I know there's, like, more, but I  
22 can't even -- I can't recall every one of them.

23 Q Can you give me a ballpark number of the  
24 number of hotels?

25 A Like different?

1 Q Of different hotels, yeah.

2 A It was probably like -- I would say it was  
3 like five to seven or maybe like no more than  
4 10, because it was kind of always the same ones.

5 Just those same ones were, like, played  
6 off each other. We'd be here for a day and then  
7 we'd go over here for a day and then we'd come back  
8 and then we'd go, yeah.

9 Q So about 10 hotels total or less than 10,  
10 you said?

11 A I mean, if we're counting, like, out of  
12 town --

13 Q Sure, let's include out of town, too.

14 A Yeah. I would say less than 10 because  
15 even if we were, like, farther out of the city or,  
16 you know, more on the outskirts of Atlanta or  
17 deeper into Georgia, it was -- it's always those  
18 same kind of hotels.

19 Q And have you sued -- other than the  
20 defendants in this lawsuit, have you sued the other  
21 hotels that you were trafficked at?

22 A I believe this is the first, to my  
23 knowledge.

24 Q Okay. And what is it that these  
25 defendants did differently that you chose to sue

1       them and not the other hotels where you were  
2       trafficked?

3           A       I think part of that is I kind of went off  
4       what my attorneys recommended as what was --

5           Q       And you don't have to --

6           A       -- in my best interests.

7           Q       I'm going to stop you there. Don't tell  
8       me anything your attorneys told you, but --

9           A       I mean, I'm just saying, like, I don't --

10          Q       Yeah.

11          A       I'm not telling you anything specific. I  
12       would just, like --

13          Q       So did these defendants do something --

14          A       To my knowledge --

15          Q       -- just from a factual standpoint --

16          A       To my knowledge, it's happening to all.

17          Q       It's happening in all of these hotels?

18          A       To my knowledge, I believe. I don't --

19          Q       When you say "it's happening," what do you  
20       mean?

21          A       What was the question you originally asked  
22       me?

23          Q       I asked you what it is about these  
24       defendants that you've named in this lawsuit, what  
25       did they do differently than these other hotels

1 that you were trafficked at that you chose to sue  
2 only these defendants.

3 A I mean, personally, I guess Red Roof was  
4 just one of the more ruthless ones.

5 Q What do you mean when you say that?

6 A That's where I was trafficked the most,  
7 and it was the one that protected my trafficker the  
8 most.

9 Q Okay. And we'll get into that more later,  
10 but I want to go through some of these other hotels  
11 that you listed.

12 The Microtel by Pink Pony, about how many  
13 times do you think you stayed there during that  
14 time period?

15 A Probably, like, less than five.

16 Q What about the La Quinta?

17 A That was, like, once.

18 Q Okay. And the Hampton Inn, you mentioned?

19 A Once, not even, like -- by once, neither  
20 one of those were even a full, like, 24 hours.  
21 They were -- I guess they noticed more than Red  
22 Roof or Microtel or Suburban.

23 Q Were you kicked out of those hotels?

24 A Never.

25 Q Of the La Quinta?

1 THE WITNESS: Yeah, I know. That's what  
2 I -- okay.

3 MS. MYKKELTVEDT: I think that makes you  
4 19.

5 A Okay. Thank you. I just didn't want to  
6 be like, yeah, I was 18, and I was definitely not.

7 BY MS. FENNELLY:

8 Q Okay. So you turned 20 in 2011 because  
9 you were born in 1991?

10 A Yes, ma'am.

11 Q Okay. So how did you first meet Diablo?

12 A I was getting off of work from Publix, and  
13 I parked in the parking, like, thing, the cover --  
14 the parking place at my Nana's. And he was jumping  
15 the fence from the other apartments beside us.

16 And he was just walking by, and then I  
17 was, like, shutting the door and he, like, said  
18 something to me. And that's where it all began.

19 Q So it was in the parking lot, you said,  
20 outside Publix?

21 A No, outside my grandmother's.

22 Q Outside your grandmother's house?

23 A Well, where I lived at the time as well.

24 Q What did he say to you? You said he said  
25 something to you when he walked by. Do you

1 remember?

2 A Oh, just like -- no, I don't remember  
3 verbatim what the man said, but like some remark  
4 to, like, get me, I guess, like flirting, like a  
5 flirtatious remark or something.

6 Q Do you know why he was at your  
7 grandmother's apartment complex?

8 A No, I don't know why he jumped the fence.

9 Q He jumped the fence there?

10 A No, he jumped -- yeah, jumped the fence  
11 from the apartments that were, like, behind/beside  
12 my grandmother's condos, townhomes, or whatever. I  
13 guess he -- I assume -- because I don't know where  
14 this -- where he could have come from if he -- so  
15 he jumped the fence and he was just --

16 Q Did you see him jump the fence?

17 A Yeah.

18 Q Where was your grandmother?

19 A I don't know. At work or something. I  
20 don't know. I don't remember.

21 Q So how did your -- from you just meeting  
22 him and kind of, I guess he was flirting with you  
23 in the parking lot, when was the next time you saw  
24 him?

25 A Well, like, the next day.

1 A I don't know.

2 Q Do you know how many --

3 A That day from Publix until he got  
4 arrested?

5 Q Uh-huh.

6 A I survived. So I don't know specific  
7 dates. I know you -- I mean, you can ask me, but  
8 I'm just saying, I'm not going to, like, pinpoint  
9 it because I don't know.

10 Q Do you know where you went after you left  
11 the Suburban Extended Stay that first time?

12 A To another hotel.

13 Q Was it a Red Roof hotel?

14 A I believe so.

15 Q How many nights had you been at the  
16 Suburban Extended Stay?

17 A It was just one.

18 Q It was just one night?

19 A Yes, ma'am.

20 Q About -- I know you don't remember  
21 specific dates, and that's okay, but about how many  
22 times do you think total -- and it can be a  
23 ballpark number -- did you stay at the Red Roof  
24 Smyrna from that time at the Publix to when Diablo  
25 got arrested?

1 A I'd say like five to seven.

2 Q How many nights would you stay each time?

3 A That just depended. That was his call.

4 Q What was it generally?

5 A Probably no more than three or two. But  
6 Diablo normally liked to stay -- I think the most I  
7 ever stayed was two, so, in a row. But because he  
8 also sold drugs, like, he would be outside in the  
9 parking lot and I would be in the room. So it was,  
10 like, getting a double whammy from, I guess both,  
11 like, both sides of what was wrong.

12 Q How many people would be in the room you  
13 were staying in when you stayed there?

14 A I was his only trafficker -- traffic --  
15 yeah, and so it was -- it would just be me in  
16 there.

17 Q So just you and Diablo at the hotel?

18 A Yes.

19 Q Would you ever go to the front desk to  
20 check in?

21 A Yeah, every time.

22 Q So they saw you at the front desk?

23 A Yeah.

24 Q Do you recall the room numbers that you  
25 stayed in?

1           A       No, ma'am. It was just they always -- the  
2       Red Roof, they always put us at the back, like,  
3       whichever -- by back, I mean whichever side is the  
4       most that's not seen, I guess, whichever angle of  
5       the hotel that was.

6                    They saw me. I mean, like I said earlier,  
7       he would, you know, he'd be like, I need to get a  
8       room for her, and they just asked for, you know,  
9       it's this for the night. And I'm present while  
10      this is, you know, happening, but it's like, you  
11      know, it was -- it was for me, but I didn't open my  
12      mouth once.

13           Q       So did you ever talk to the employees that  
14      were working there?

15           A       Yeah, when I -- like if I needed towels or  
16      clean linens, sometimes they would bring the towels  
17      to the room, other times I would take the dirty  
18      towels down in exchange for clean towels, or vice  
19      versa with the linens.

20           Q       Did you ever tell anyone working at the  
21      hotel what was going on?

22           A       No, ma'am. But I don't feel like I needed  
23      to.

24           Q       Why not?

25           A       It was very obvious. And it wasn't like

1 it was me at the back. It looked like --

2 Q I'm sorry. What was that? It didn't --

3 A It wasn't -- like, it wasn't just me back  
4 there.

5 Q Who else was back there? I thought it was  
6 just you and Diablo.

7 A Oh, yeah, in the room. When you asked if  
8 we were in the room, yeah, it's me and him were  
9 solely in my room and whoever he sent to my room.  
10 But I'm talking about the whole back side of that  
11 hotel.

12 Q How many people were back there?

13 A I mean, I mean, just about every room. I  
14 don't know the girls specifically. I don't know  
15 their name. It's just all the same scenario. But  
16 the rooms conjoining to me, like the room right  
17 beside my bed or against the TV wall on that side,  
18 I mean, they're paper thin.

19 Q How -- what were the signs that you were  
20 able to tell that these other girls back there were  
21 in the same scenario you said?

22 A Their pimp sitting outside the door or  
23 listening to them getting hit and raped or  
24 trafficked, the Black guys that we had with the  
25 bruised arms, when all they did was exchange the

1 bloody sheets for the clean sheets.

2 Q Were the police ever present while you  
3 were at the Red Roof Smyrna?

4 A If they were ever present, the hotel staff  
5 would call us and make us aware that they were  
6 driving around, whether it was to my pimp's  
7 specific line or if it was to the room to me.

8 MR. REAM: Objection.

9 BY MS. FENNELLY:

10 Q Who called you on the line and told you  
11 that the police were coming?

12 A Like, just the front office and, like, the  
13 cops are driving around.

14 Q Do you know who it was, like the name of  
15 the person?

16 A Whoever was working the day setting.

17 Q And what did you do once you got a call  
18 like that?

19 A I mean, it wasn't for me to decide.

20 Q Did y'all hide? Did y'all run away?

21 A It would be to whatever he said.

22 Normally, when it -- we were aware of the cops,  
23 obviously, it was not to run to the car. So my  
24 trafficker just told me to stay in the room, and  
25 you would obviously see that the calls ceased for a

1 little bit.

2 Q Did you ever say to one of these hotel  
3 workers that you were not there prostituting  
4 voluntarily, but you were instead there against  
5 your will?

6 A No.

7 Q Okay. Were you ever on the phone when  
8 Diablo wasn't in the room?

9 A No.

10 Q Diablo was always in the room?

11 A No.

12 Q So --

13 A Who did I have to call?

14 Q The police, your grandmother, your family.

15 A No. My grandmother was who I was  
16 protecting. I wasn't going to piss him off and  
17 then he shoot up her house, which was his threat to  
18 me. So I'm going to do whatever to protect the  
19 only lady that matters truly to me, and that's what  
20 I did.

21 Q When you were staying at the hotel, did  
22 you have the blinds open or closed generally while  
23 you were in the room?

24 A Closed.

25 Q Did you use the Do Not Disturb sign?

1 MR. REAM: Calendar is 7.

2 BY MS. FENNELLY:

3 Q Oh, on 4-7, and mark 4/28 as your -- you  
4 can put "second pay." Right there. And that will  
5 mean it was your second to last paycheck at Publix.

6 A Wait. You want me to do what?

7 Q Mark it on this calendar, on the 28th,  
8 write "second pay" and that will reflect it was  
9 your second to last paycheck. That's the 22nd.

10 A I don't really understand what the heck  
11 I'm doing.

12 Q We're just establishing a timeline for the  
13 record. You testified earlier that your alleged  
14 trafficking began around this time frame, so we're  
15 trying to establish when that was. So I just need  
16 you to mark it on the calendar so we can do that.

17 A Okay. So you want me to write what on  
18 what?

19 Q Where it says the 28th on the calendar --

20 A Okay.

21 Q -- write "second pay."

22 A Okay.

23 Q And then if you'll turn to the last page  
24 of this packet --

25 A Now what?

Page 131

1 Q Are you on the last page? It says,  
2 "Publix Super Markets, Inc.," at the top and then  
3 there's a box that says --

4 A Okay, yeah.

5 Q -- "Retail Resignation Form."

6 And the subject line says, "Resignation  
7 for [REDACTED] [REDACTED]" I take it this is you,  
8 correct?

9 A Yes.

10 Q And if you go to the bottom where it says,  
11 "Detailed description of circumstances surrounding  
12 resignation," it says, "[REDACTED] did not call or  
13 show up for her scheduled shifts on 4/30, 5/1, 5/2  
14 or 5/4. I called her to see if she was okay, and  
15 she told me she had gone back to Tennessee to be  
16 with her mother who is sick and did not know when  
17 she would return to Atlanta."

18 Do you remember that phone call?

19 A No. It was obviously a lie.

20 Q Where were you on 4/30, 5/1, 5/2 and 5/4?

21 A 4/30 looks like the first day hell  
22 started.

23 Q Okay. So April 30th, if you'll mark on  
24 this calendar, we'll put "traffic began."

25 Okay. When your previous employer at

1 Publix called you and said -- asked why you hadn't  
2 gone back to work, why didn't you say you needed  
3 help?

4 A Because the threats that were the reason  
5 why I was in the room to begin with.

6 Q The threats towards your grandmother?

7 A Yes, ma'am.

8 Q Did you ever tell your grandmother that  
9 there had been these threats against her?

10 A No, ma'am.

11 Q Why?

12 A Because it's not -- I wasn't willing to  
13 play with my grandmother's life.

14 Q Don't you think it might have been safer  
15 for her if she had known? She could have moved  
16 somewhere else.

17 A What is she going to do? Call the cops?  
18 What are they going to do?

19 Q Help her. You don't believe the police  
20 could have helped?

21 MS. MYKKELTVEDT: Object to the form. You  
22 can answer.

23 A No.

24 BY MS. FENNELLY:

25 Q Why don't you think the police could have

1     helped?

2           A     After, like, having a somewhat normal life  
3     and then it abruptly changes, like a huge shift,  
4     your faith in humanity or anything for the judicial  
5     system or whatever, it's out the window. You're  
6     just trying to survive.

7           Q     You have faith in the judicial system now,  
8     correct?

9           A     No, yeah, but I'm saying, like, back then,  
10    I don't think anyone is going to save me.

11          Q     Why did you think that?

12          A     It wasn't even a thought. It was me  
13    saving my grandmother. It wasn't a thought of how  
14    can I be rescued, who is going to come save me.  
15    No, it was -- it was just to protect her. So I  
16    didn't -- I wasn't going to play with her life and  
17    find out if they did or if they didn't. It's not  
18    something I was willing to live with.

19          Q     So you -- instead of going to the police,  
20    you chose to stay in the situation you were in to  
21    protect your grandmother?

22                MS. MYKKELTVEDT: Object to the form.

23          A     I didn't choose to stay in anything. The  
24    threats that were put against me forced me to stay.

25    BY MS. FENNELLY:

1           A       Everyone kind of knows that a sex worker  
2       is doing it or a prostitute is doing it, and no one  
3       knew I was. No one knew my name. No one knew -- I  
4       mean, it was like do it and, like, get a paycheck  
5       for it and, like, everything like that, like.

6                   And then mine was, I was held against my  
7       will with threats and abuse, physical, emotional,  
8       mental abuse. And I guess out of fear, there's a  
9       difference. I mean, I don't -- I don't know --  
10      like someone wants to do what I was forced to do.

11          Q       So to the naked eye, so to speak, if  
12      someone that had no idea about sex trafficking or  
13      prostitution, if they went to a hotel where, say,  
14      both were going on, what would visibly be the  
15      difference?

16          A       Rephrase the question, I guess.

17          Q       Sure. To someone that doesn't know about  
18      the threats or anything going on, to someone  
19      outside of the situation, what would be the visible  
20      signs that someone was being trafficked as opposed  
21      to voluntarily prostituting themselves?

22          A       I don't know that there are any visible  
23      signs other than if a -- like a bruise was on my  
24      eye that day or something. Like I don't know -- I  
25      think it also depends on, like, where you're at,

1 like, if you're at church or at a restaurant, I  
2 mean, it's -- there's no difference. But if you're  
3 at a hotel not speaking or you're looking down at  
4 the ground and not showing your teeth and not  
5 looking anyone in the eyes unless your name is  
6 called on by your -- by your trafficker, then I  
7 feel like those could be more obvious, but I'm not  
8 everybody.

9 Q Are you aware of any girls that were  
10 voluntarily prostituting themselves during your  
11 alleged trafficking?

12 A No, ma'am.

13 (Defendants' Exhibit JD4-15 marked.)

14 BY MS. FENNELLY:

15 Q I'm going to show you JD4-15. And this  
16 is -- was also in your production. It's from your  
17 time at Peachford that we talked about a little bit  
18 earlier.

19 A Okay.

20 Q And this was again in your production.

21 A So you want it on my calendar, Peachford?

22 Q No. We can just -- or yeah, let's do it  
23 on the calendar. So the admission date is 8/29/11,  
24 so if you'll flip to August.

25 A Okay.

1 A (Witness complies with request.)

2 Okay, and then what page?

3 Q The next page on this bank statement. And  
4 there are a few more on 4/19 in North Carolina.  
5 And then if you'll go down to the third from the  
6 bottom, it says, CheckCard 419, Charlotte, North  
7 Carolina, V-Nails and Spa for \$80.

8 How often did you get your nails done  
9 while you were being trafficked?

10 A I guess whenever he wanted them done.

11 Q So did Diablo pay for that?

12 A I had no money. I never saw a bit of the  
13 money that was produced.

14 Q So was Diablo with you then in North  
15 Carolina?

16 A Not that I recall.

17 Q So how did you pay for things when Diablo  
18 wasn't there if you didn't have any money?

19 A No. I'm saying, like, Diablo wouldn't  
20 have gave me the money.

21 Q He wouldn't have given you the money?

22 A What did you say?

23 Q I asked, how did you pay for your nails in  
24 North Carolina?

25 A No, before that.

1 A Okay. Yes, ma'am, I'm on it.

2 Q And these are several posts from 2011,  
3 January of 2011, where you say, "Playing card games  
4 with my babes. Sick. Stuck with my babes. Eating  
5 with baby."

6 Who are you talking about when you say  
7 "baby" in these posts?

8 A Probably Diablo.

9 Q Where it says, "If I tell you" --

10 A "If I tell you I love you, can I keep you  
11 forever," that was probably just being -- I mean,  
12 that was just like a -- that's just a quote like  
13 comment.

14 Q Right. Did you ever tell Diablo --

15 A I didn't write that. Like that wasn't my  
16 words.

17 Q Did you ever tell Diablo that you loved  
18 him?

19 A Not that I can recall. But I could  
20 possibly see me saying it before he threw my ass in  
21 the hotel room, beat my ass and sold it.

22 Q So these posts are from January of 2011.  
23 Do you now think that you knew Diablo that early in  
24 January of 2011?

25 A I know I knew him then because I met him

1 at the end of 2010. I just wasn't trafficked until  
2 2011. So yeah, this is when we -- I guess we were  
3 playing boyfriend and girlfriend, but I didn't know  
4 we were playing.

5 Q But you testified earlier that you thought  
6 you met him the first time at your grandmother's  
7 house when you were leaving work from Publix; is  
8 that correct?

9 A I knew I had gotten off work. Okay.  
10 Then -- where is the damn Publix one? Okay. Here  
11 we go.

12 MS. PATTERSON: Last page.

13 A Oh, that's [REDACTED].

14 BY MS. FENNELLY:

15 Q This is [REDACTED] from Tennessee?

16 A Yeah, yeah.

17 Q Okay. I gotcha.

18 A Sorry.

19 Q When did you and [REDACTED] break up?

20 A I don't know. It was like once I moved to  
21 Georgia, it was kind of like -- like I don't think  
22 it had to be said, you know, but it was like a back  
23 and forth thing. He would come to Atlanta, I'd go  
24 to Tennessee, you know, like stupid.

25 Q Okay. Now I want to talk a little bit

1 about your time with CB in 2013.

2 A Uh-huh.

3 Q So that was when you had jury duty,  
4 correct?

5 A Yes.

6 Q And you were coming back from jury duty to  
7 go to the Smith's house?

8 A To get back on -- I was -- I was walking  
9 back from the -- what is it? The -- you know, the  
10 main building where you would go for jury duty.

11 Q The courthouse?

12 A Yes, ma'am. And then I was walking  
13 because it wasn't far from -- it's the train  
14 station right across from what used to be the  
15 underground mall, you know. And I was just walking  
16 to go get on the train.

17 Like, you know, you have to go down into  
18 the entry and then you take levels down to  
19 whichever one you go. And he was sitting right  
20 there, and he said, "Come here, [REDACTED]." And I  
21 was like, "Damn."

22 Q So you just ran into him in downtown  
23 Atlanta?

24 A Like freaking coincidence.

25 Q And so he said, "Come here, [REDACTED]." And

1 then what happened after that?

2 A Game over.

3 Q You went with him?

4 A Because I -- my arm gripped and taken with  
5 him, yes.

6 Q Where did y'all go?

7 A I don't know the play by play.

8 Q Well, did you go back to the condo? Was  
9 it a hotel?

10 A No, it was a hotel.

11 Q Okay. Do you know what hotel it was?

12 A I know it was a Red Roof. I just don't  
13 know which one or if it was -- I don't even know  
14 which Red Roof it was.

15 Q And you stayed there the whole time,  
16 correct?

17 A Yes.

18 Q For less than seven days?

19 A Yes.

20 Q Did you ever call the Smiths while you  
21 were with CB?

22 A Yeah. He had me call them and tell them I  
23 wasn't coming back.

24 Q They didn't look for you?

25 A No, it's not that they didn't look for me.

1 I mean, I called them and told them that, like, I'm  
2 not coming back.

3 And there were ground rules established  
4 when they offered me their home and, you know, just  
5 the opportunity, I guess. And I knew if I crossed  
6 the line, that it was over.

7 So once I called them and told them I  
8 wasn't coming back and I'm fine and this is what I  
9 choose, they took my stuff to my Nana's and that  
10 was that.

11 They were disappointed. They, you know,  
12 gave me a Bible and wrote a message, but, you know,  
13 there was nothing they could do.

14 Q When you went there with CB, did he  
15 already have a room or did you check into the  
16 hotel?

17 A I don't remember.

18 Q Do you know if you talked to any hotel  
19 workers while you were there?

20 A I don't -- no, not that I know of.

21 Q Okay. I take it you didn't ask any hotel  
22 employee for help?

23 A No, ma'am.

24 Q Do you recall -- I know you don't remember  
25 the exact hotel, but it might help you, do you

1 recall where the room was?

2 A No.

3 Q Was anyone else there?

4 A Yes, there was another girl. There was a  
5 tall, dark-skinned man that I thought may have been  
6 the one that I pointed out beside him in an  
7 earlier -- like when y'all showed me the pictures,  
8 I don't know which one to specify, but there was a  
9 tall, dark dude, and he had a gun.

10 So I had never -- I'd never been, like --  
11 like Diablo had a gun, but it wasn't -- that was  
12 never the threat, but to my grandparents.

13 So like to have a big old dude with a gun,  
14 and then you just got the trafficker right there,  
15 it was just kind of like that was a dynamic I'd  
16 never been around, so yeah.

17 Q How did you get away from CB?

18 A I didn't care if I died.

19 Q You ran away, is that what that means?

20 A Yeah. I mean, like, I looked and I told  
21 him, I said, "I'm not doing this. You can kill  
22 me." I'm not -- I just...

23 Q And then what happened? He let you go  
24 after that?

25 A No, he beat my ass. And then, yeah, he

1       threw me out of the car, like, yeah.

2               No, I didn't say all this to him in the  
3       room. I knew I'd have been killed. But yeah, I  
4       said it to him in the car, "I'm not going back,"  
5       and then he just like bop, bop, and then threw me  
6       out of the car.

7           Q       You said -- you said you think you would  
8       have been killed if you said that to him in the  
9       hotel room?

10          A       Yeah.

11          Q       Was anyone else ever killed in a hotel  
12       room?

13          A       No. I just didn't know because I never  
14       seen it -- that dynamic ever. I knew we'd get hit  
15       and stuff, but not like a gun to our head, just  
16       like once, and that's just because I pissed him  
17       off.

18          Q       Did CB know where your grandmother lived  
19       or that was just Diablo?

20          A       That was just Diablo.

21          Q       Did you ever file a police report after  
22       your time with CB?

23          A       For what?

24          Q       For trafficking you allegedly.

25          A       It wasn't alleged. No, I did not.

## CERTIFICATE

STATE OF GEORGIA:

COUNTY OF FULTON:

I hereby certify that the foregoing transcript was taken down, as stated in the caption, and the colloquies, questions and answers were reduced to typewriting under my direction; that the transcript is a true and correct record of the evidence given upon said proceeding.

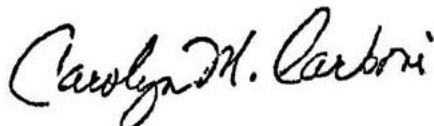
I further certify that I am not a relative or employee or attorney of any party, nor am I financially interested in the outcome of this action.

I have no relationship of interest in this matter which would disqualify me from maintaining my obligation of impartiality in compliance with the Code of Professional Ethics.

I have no direct contract with any party in this action and my compensation is based solely on the terms of my subcontractor agreement.

Nothing in the arrangements made for this proceeding impacts my absolute commitment to serve all parties as an impartial officer of the court.

)22.



---

CAROLYN M. CARBONI, RPR, RMR, CCR-B-878